## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

THE UNIVERSITY OF	)	
NORTHERN VIRGINIA, INC.	)	
	)	
Plaintiff,	)	
v.	)	
	)	Civil Action No. 1:07cv1057
ACCREDITING COUNCIL FOR	)	
INDEPENDENT COLLEGES AND	)	
SCHOOLS	)	
	)	
Defendant.	)	
	)	

## **JOINT MOTION TO STAY THE PROCEEDINGS**

COME NOW Plaintiff, The University of Northern Virginia ("UNVA"), and Defendant, Accrediting Council of Independent Colleges and Schools ("ACICS"), by counsel, and jointly move the Court to stay the proceedings before this Court, and in further support of this motion state as follows:

- 1. The parties have reached a settlement in principle of their dispute, subject to the finalization of a written settlement agreement.
- 2. As part of the settlement, the parties have agreed that the November 13, 2007 Preliminary Injunction shall remain in effect through August 5, 2008. The parties have further agreed that on August 5, 2008, they will file with the Court a joint stipulation of dismissal with prejudice dismissing the case in its entirety.
- 3. The parties have also reached an agreement as to ACICS's attorneys' fees and the reduction of the Preliminary Injunction bond. Pursuant to their agreement, the parties expect to submit a consent order in the near future to release the amounts currently held for the cash bond and to reduce the Preliminary Injunction bond to the amount of \$100.00.

4. The parties have also agreed to request a suspension of the briefing schedule set forth in the Court's December 11, 2007 Order and a stay of the proceedings through presentation of a joint stipulation of dismissal on August 5, 2008.

WHEREFORE, UNVA and ACICS respectfully request that this Court suspend the briefing schedule, continue the Preliminary Injunction through August 5, 2008, subject to a future request by the parties to reduce the bond to \$100.00, and stay the proceedings in this case until August 5, 2008, when the parties shall file a joint stipulation of dismissal with prejudice dismissing the case in its entirety.

## THE UNIVERSITY OF NORTHERN VIRGINIA

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Counsel for Defendant

Accrediting Council of Independent

Colleges and Schools

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was consented to by counsel and served through the Court's electronic filing system this 21<sup>st</sup> day of December, 2007 to:

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